

**Before the
FEDERAL COMMUNICATION COMMISSION
Washington, DC 20554**

In the matter of)	
)	
Amendment to Part 97 of the Commission's)	
Amateur Radio Service Rules to eliminate)	RM-10787
the Morse Code proficiency requirements)	
for all classes of Amateur license.)	
)	

To the Commission:

PURPOSE AND REASON OF COMMENTS

These comments are made to provide the Commission with information in helping it make a determination of the future of Morse Code in Part 97 of the Amateur Radio Service Rules. That the World Radio Communication Conference 2003 (WRC-03) made optional the requirement to prove the ability to send and receive Morse signals to operate below 30 MHz. That National Conference of Volunteer Examiner Coordinators (NCVEC) has overlooked the significance of the code requirement.

COMMENTS

1: I hold an Amateur General class license with the assign call of N0TTW. I have been an Amateur Radio Operator since 1986. I have passed the telegraphy requirement for my current license. My background is in Electronics as I am an Electronics Technician.

2: I do not concur with NCVEC's petition to eliminate the Morse Code requirement in the Amateur Service. Their reasoning is flawed in the importance of the code.

3: That removal of the Morse Code requirement would require the Commission to reevaluate the existing written test based on the need to improve the pool of questions and answers to cover more technical knowledge.

ARGUMENTS

Morse code provides a service beyond what most will argue for. Here are my arguments:

a: It provides an individual, who accomplishes the passing of Element 1 to attain the next higher-class license, a sense of pride. Something earned through dedication and hard work has meaning. In the Amateur Service, having an Amateur License should have some meaning. Something given to someone gives that person no reason to take pride in it. Without pride, comes irresponsibility and disrespect. History has proven this as seen in the former 11-meter band (27 MHz), now known as the Citizen Band radio (CB).

b: It provides a pool of operators that physically disabled operators can tap from. Many operators are physically challenged and can only use Morse Code as a transmission mode. Not only are these operators here in the US, but in other countries as well. The equipment is simpler to operate for these individuals as well. Without a good pool of CW operators, these individuals will be left with limited access to other operators.

c: Morse Code is not obsolete as it is used in the private industries as well. Morse Code is used to adapt a computer for the physically challenge. The University of Wisconsin – Eau Claire has a program called Morse 2000 Outreach. The program uses Morse Code as one of it's methods to help those with physical disabilities be able to communicate with the world through computers.

d: Morse Code is used by remote operations and undeveloped regions in the world that have limited power budgets. Voice and data communications require more power, to send an intelligible signal. Without a pool of operators capable to understand Morse Code, these operations or regions would have a harder time sending traffic to distant stations, as there would be less operators listening in the CW sub-bands.

The other argument is that removal of the Morse requirement, the Commission would have to improve the written test. The tests (given at this moment) are passed by memorization. The tests do reflect the knowledge needed to become an Amateur Radio Operator, but do not require studying of theory or memory. Many books are sold with the pool of questions and answers for memorization. Most Technicians (not all) that became this class without the code test, have a hard time with electronics theory. These individuals (when asked) will state that they passed their written test by memory.

SOLUTION

I ask the Commission to keep the code requirement as it is and to reject the NCVEC petition.

I also ask the Commission to create a restricted General class type license, **as a compromise**, if the individual doesn't pass Element 1 Morse Code test. No new license call is needed as it can be ended with a "/X" for CW/Digital or the word "restricted" is used on voice. Making a restricted license would allow an individual to have an opportunity of trying HF, on a limited time basis of 1 year. If the individual doesn't pass the Element 1 portion, the individual goes back too Technician class. The restrictions can be similar as the old Novice class license. Restricting the power output to no more than 100 watts and to allow voice and CW privileges on 10-meters (28 MHz), voice and CW privileges on 15-meters (21 MHz) and CW only privileges on 40-meters (7 MHz). The license would allow them the same frequencies allocations in the mentioned bands as the regular General class license has now.

Respectfully submitted,

/s/

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